

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*, (Jointly Administered)

Debtors.¹

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**INFORMATIVE MOTION REGARDING CLAIM OBJECTIONS SCHEDULED TO BE
HEARD AT NOVEMBER 18 AND NOVEMBER 20 SATELLITE HEARINGS**

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court's *Order Regarding Procedures for Hearings on November 18 and 20, 2020* [Case No. 17-3283, ECF No. 15097] (the "Satellite Hearing Procedures Order")², the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Satellite Hearing Procedures Order requires counsel who intend to speak to jointly file an informative motion regarding, *inter alia*, speakers and time allocations. At present, the Oversight Board is not aware of counsel who intend to appear and speak on behalf of the claimants scheduled for the November 18 and 20, 2020 hearings.

representative of the Commonwealth of Puerto Rico (the “Commonwealth”) pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),³ the Oversight Board respectfully states as follows:

1. Laura Stafford and/or Brian S. Rosen of Proskauer Rose LLP will appear telephonically at the November 18, 2020 hearing and seek to be heard on the following matters, as well as any and all objections, responses, statements, joinders, and replies thereto:

- *Eighty-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [Case No. 17-3283, ECF No. 8977]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.
- *Ninety-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [Case No. 17-3283, ECF No. 8983]. The Oversight Board requests 30 minutes of the 60 minutes allocated to this matter.
- *Ninety-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [Case No. 17-3283, ECF No. 8984]. The Oversight Board requests 22.5 minutes of the 45 minutes allocated to this matter.
- *Ninety-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [Case No. 17-3283, ECF No. 9546]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.
- *One Hundred First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands,*

³ PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

Employment, or Services Provided [Case No. 17-3283, ECF No. 9551]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.

- *One Hundred Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [Case No. 17-3283, ECF No. 9552]. The Oversight Board requests 15 minutes of the 30 minutes allocated to this matter.
- *One Hundred Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [Case No. 17-3283, ECF No. 9554]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.
- *One Hundred Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [Case No. 17-3283, ECF No. 9555]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.
- *One Hundred Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [Case No. 17-3283, ECF No. 9557]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.
- *One Hundred Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [Case No. 17-3283, ECF No. 9557]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.
- *One Hundred Tenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [Case No. 17-3283, ECF No. 9560]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.

- *One Hundred Eleventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes [Case No. 17-3283, ECF No. 9561].* The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.
- *One Hundred Thirteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes [Case No. 17-3283, ECF No. 9563].* The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.
- *One Hundred Fourteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes [Case No. 17-3283, ECF No. 9564].* The Oversight Board requests 15 minutes of the 30 minutes allocated to this matter.
- *One Hundred Fifteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes [Case No. 17-3283, ECF No. 9565].* The Oversight Board requests 15 minutes of the 30 minutes allocated to this matter.

2. Laura Stafford and/or Brian S. Rosen of Proskauer Rose LLP will appear

telephonically at the November 20, 2020 hearing and seek to be heard on the following matters, as well as any and all objections, responses, statements, joinders, and replies thereto:

- *One Hundred Eighteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes [Case No. 17-3283, ECF No. 9568].* The Oversight Board requests 22.5 minutes of the 45 minutes allocated to this matter.
- *One Hundred Nineteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims [Case No. 17-*

3283, ECF No. 9569]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.

- *One Hundred Twenty-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [Case No. 17-3283, ECF No. 9572]. The Oversight Board requests 15 minutes of the 30 minutes allocated to this matter.
- *One Hundred Twenty-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [Case No. 17-3283, ECF No. 9574]. The Oversight Board requests 15 minutes of the 30 minutes allocated to this matter.
- *One Hundred Twenty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [Case No. 17-3283, ECF No. 9576]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.
- *One Hundred Twenty-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [Case No. 17-3283, ECF No. 9892]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.
- *One Hundred Twenty-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [Case No. 17-3283, ECF No. 9900]. The Oversight Board requests 15 minutes of the 30 minutes allocated to this matter.
- *One Hundred Thirty-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [Case No. 17-3283, ECF No. 9911]. The Oversight Board requests 15 minutes of the 30 minutes allocated to this matter.

- *One Hundred Thirty-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [Case No. 17-3283, ECF No. 9915]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.
- *One Hundred Forty-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [Case No. 17-3283, ECF No. 9934]. The Oversight Board requests 15 minutes of the 30 minutes allocated to this matter.
- *One Hundred Forty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [Case No. 17-3283, ECF No. 9936]. The Oversight Board requests 7.5 minutes of the 15 minutes allocated to this matter.
- *One Hundred Forty-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [Case No. 17-3283, ECF No. 9938]. The Oversight Board requests 15 minutes of the 30 minutes allocated to this matter.

Dated: November 15, 2020.
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen
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